

WHITE & CASE LLP  
Jeremy Ostrander (SBN – 233489)  
jostrander@whitecase.com  
3000 El Camino Real  
2 Palo Alto Square, Suite 900  
Palo Alto, CA 94306-2109  
Telephone: (650) 213-0300  
Facsimile: (650) 213-8158

*Attorney for Defendants National Association of REALTORS®, California Association of REALTORS®, Lodi Association of REALTORS®, and Central Valley Association of REALTORS®*

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

JOHN DIAZ,

**Plaintiff.**

V.

LODI ASSOCIATION OF REALTORS®,  
CENTRAL VALLEY ASSOCIATION OF  
REALTORS®, CALIFORNIA  
ASSOCIATION OF ASSOCIATION OF  
REALTORS®, NATIONAL ASSOCIATION  
OF REALTORS®, AND DOES 1 THROUGH  
5, INCLUSIVE.

### Defendants.

Case No. 2:25-cv-01594-DC-CKD

**STIPULATION TO EXTEND  
TIME TO RESPOND TO  
INITIAL COMPLAINT BY NOT  
MORE THAN 28 DAYS  
(L.R. 144(a))**

Hon. Dena M. Coggins

WHEREAS, John Diaz (“Plaintiff”) filed the above-captioned action against Lodi Association of REALTORS®, Central Valley Association of REALTORS®, California Association of Association of REALTORS®, National Association of REALTORS® (together “Defendants”) in the Eastern District of California on June 9, 2025;

WHEREAS, pursuant to Rule 12 of the Federal Rules of Civil Procedure, the earliest deadline for any Defendant to respond to the Complaint is July 7, 2025;

WHEREAS, Defendants will not contest proper service of the Complaint;

WHEREAS, Defendants requested and Plaintiff agreed to a seven (7) day extension of that deadline for all Defendants to respond to the Complaint;

WHEREAS, Local Rule 144(a) provides that “[u]nless the filing date has been set by order of the Court, an initial stipulation extending time for no more than twenty-eight (28) days to respond to a complaint . . . may be filed without approval of the Court if the stipulation is signed on behalf of all parties who have appeared in the action and are affected by the stipulation.”

IT IS HEREBY STIPULATED by and between the parties hereto through their respective attorneys of record that Defendants may respond to the Complaint on or before **July 14, 2025**.

Dated: June 24, 2025

WHITE & CASE LLP

By: */s/ Jeremy Ostrander*  
Jeremy Ostrander

Jeremy Ostrander (SBN – 233489)  
jostrander@whitecase.com  
3000 El Camino Real  
2 Palo Alto Square, Suite 900  
Palo Alto, CA 94306-2109  
Telephone: (650) 213-0300  
Facsimile: (650) 213-8158

*Attorney for Defendants National Association of REALTORS®, California Association of REALTORS®, Lodi Association of REALTORS®, and Central Valley Association of REALTORS®*

1 Dated: June 24, 2025

LAW OFFICE OF CHARLES A. HAMM

2 By: /s/ Charles A. Hamm  
3 (as authorized on 6/23/25)  
Charles A. Hamm

4 Charles A. Hamm (SBN – 359861)  
5 info@law4ca.com  
6 300 Montgomery Ave #Q  
Oxnard, CA 93036  
Telephone: 805-308-4266

7 Attorney for Plaintiff John Diaz

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## **PROOF OF SERVICE**

I, Jeremy Ostrander, certify and declare as follows:

I am employed in the county of Santa Clara, State of California. I am over the age of 18 and not a party to the action within. My business address is 3000 El Camino Real 2 Palo Alto Square, Suite 900, Palo Alto, California 94306-2109.

On June 24, 2025, I caused a copy of **STIPULATION TO EXTEND TIME TO RESPOND TO INITIAL COMPLAINT BY NOT MORE THAN 28 DAYS (L.R. 144(a))** to be served upon all counsel of record via the Court's CM/ECF system.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on June 24, 2025 at Palo Alto, California.

/s/ Jeremy Ostrander  
Jeremy Ostrander